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1	Valerie Yanaros (Texas SBN 24075628) Yanaros Law P.C.	
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8	UNITED STATES	DISTRICT COURT
9	FOR THE DISTRICT OF CALIFORNIA	
10		
11	Dustin Neff, an individual,) Case No.: 3:23-cv-02518-JD
12	Plaintiff,	SECOND STIPULATION OF TIME TO RESPOND TO COMPLAINT
13	VS.) RESTORD TO COMI LAINT
14		Complaint Filed: May 24, 2023
15	SBA Entertainment, LLC, a Colorado limited liability company; Goode)
16	Enterprise Solutions Inc., a Colorado corporation; and Does 1-10, inclusive,)
17)
18	Defendants.)
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		1 - D EVTENSION OF TIME

1	IT IS HEREBY STIPULATED by and between Plaintiff, Dustin Neff ("Plaintiff"), and		
2	Defendant, Goode Enterprise Solutions Inc. ("GES"), by and through their respective counsel, that		
3	pursuant to Federal Rule of Civil Procedure 6(a), and Local Rule 6-1, GES may have to and		
4	including August 31, 2023, to file a responsive pleading in this matter, as GES is investigating the		
5	claims and is interested in engaging in settlement negotiations without the cost and expense of filing		
6	a responsive pleading. GES' counsel is also in the process of applying to appear Pro Hac Vice and		
7	acquire local counsel in this matter. This does not alter the date of any event, or any deadline		
8	already scheduled by the Court, and this is the second extension provided by Plaintiff.		
9			
10	Date: July 31 st , 2023. Respectfully submitted,		
11	<u>/s Valerie A. Yanaros, Esq.</u> Valerie Yanaros, Esq.		
12	Texas Bar No. 24075628 Applying to Appear Pro Hac Vice in		
13	the Northern District Court of California		
14	Yanaros Law, P.C. 8300 Douglas Avenue Suite 800		
15	Dallas, Texas 75225 Telephone: (512) 826-7553		
16	<u>valerie@yanaroslaw.com</u>		
17	ATTORNEY FOR DEFENDANT GES		
18	Scott Han Burroughs, Esq.		
19	Frank R. Trechsel, Esq. DONIGER/BURROUGHS		
20	ATTORNEYS FOR PLAINTIFF		
21			
22	ATTESTATION		
23	Concurrence in the filing of this document has been obtained from each of the individual(s) whose		
24	electronic signature is attributed above.		
25	By_/s/ Valerie Yanaros		
26	Valerie Yanaros Attorney for Defendant,		
27	Goode Enterprise Solutions, Inc.		
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1	IT IS SO ORDERED, Defendant, GES, sha	ll have up to and including
2	August 31, 2023, to file a responsive pleading.	
3	DATE:	
4		United States District Court Judge
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1 **CERTIFICATE OF SERVICE** 2 I hereby certify that on July 31st, 2023, the foregoing document was filed with the clerk of 3 the court for the U.S. District Court, Northern District of California, using the electronic case filing 4 system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to all 5 attorneys of record who have consented in writing to accept this Notice as service of documents by 6 electronic means, including: 7 Scott Alan Burroughs (SBN 235718) scott@donigerlawfirm.com Frank R. Trechsel (SBN 312199) ftrechsel@donigerlawfirm.com 10 DONIGER / BURROUGHS 603 Rose Avenue 11 Venice, California 90291 Telephone: (310) 590-1820 12 Attorneys for Plaintiff 13 14 /s/ Valerie Yanaros, Esq. VALERIE YANAROS, ESQ. 15 16 17 18 19 20 21 22 23 24 25 26 27 28